

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER
LEO-GUERRA, MICHAEL MAERLENDER,
BRANDON PIYEVSKY, BENJAMIN SHUMATE,
BRITTANY TATIANA WEAVER, and
CAMERON WILLIAMS, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY, UNIVERSITY
OF CHICAGO, THE TRUSTEES OF COLUMBIA
UNIVERSITY IN THE CITY OF NEW YORK,
CORNELL UNIVERSITY, TRUSTEES OF
DARTMOUTH COLLEGE, DUKE UNIVERSITY,
EMORY UNIVERSITY, GEORGETOWN
UNIVERSITY, THE JOHNS HOPKINS
UNIVERSITY, MASSACHUSETTS INSTITUTE
OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME
DU LAC, THE TRUSTEES OF THE
UNIVERSITY OF PENNSYLVANIA, WILLIAM
MARSH RICE UNIVERSITY, VANDERBILT
UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125

Hon. Matthew F. Kennelly

**DECLARATION OF EDWARD J. NORMAND AND STATEMENT OF COMPLIANCE
UNDER LOCAL RULE 37.2**

I, Edward J. Normand, am a partner at the law firm of Freedman Normand Friedland
LLP, counsel for Plaintiffs in this case. I hereby declare as follows:

1. I submit this Declaration in support of Plaintiffs' Motion to Modify Case
Management Order #1.

2. On November 3, 2023, Plaintiffs notified Defendants that they intended to make this request in time for the next status hearing, and provided a copy of Plaintiffs' proposed schedule on November 3, 2023.

3. On November 9, 2023 at 1:30 P.M. ET, the parties met and conferred to discuss Plaintiffs' anticipated motion and the bases for the motion. Among others, in attendance for that conference on behalf of Plaintiffs was Robert Gilbert, Edward Normand, and Richard Cipolla. In attendance for that conference on behalf of Defendants were, among others, Matthew Kutcher and David Gringer.

4. On November 15, 2023, Defendants stated via email they would not agree to any extension of the discovery deadline.

5. The parties have met and conferred in good faith but have been unable to resolve all of their disputes concerning the discovery schedule. Plaintiffs respectfully submit that they have complied with Local Rule 37.2

6. Attached as Exhibit A to this declaration is a compilation of the dates that Plaintiffs sought depositions, received dates for those depositions, and ultimately took or scheduled those depositions.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of November, 2023

/s/ Edward J. Normand
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